

West Virginia Department of Environmental Protection

*Austin Caperton
Cabinet Secretary*

Title V Operating Permit Revision



For Minor Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Action Number: MM05 **SIC:** 2821
Name of Permittee: DuPont Specialty Products USA, LLC
Facility Name/Location: Washington Works
County: Wood
Permittee Mailing Address: P.O. Box 2800 Washington WV 26181-2800

Description of Permit Revision: The purpose of this modification is to allow for sampling of pellets from the Solid Phase Polymerization section of the Melt Process unit (MPW-1).

Title V Permit Information:

Permit Number: R30-10700001-2016 (Part 5 of 14)
Issued Date: December 14, 2016
Effective Date: December 28, 2016
Expiration Date: December 14, 2021

Directions To Facility: From I-77, take the exit for Rt-95/Camden Avenue. Proceed West until intersection with Rt-14 then turn right. After about ¼ mile turn left onto corridor D Bypass entrance. Follow the bypass to the exit just before the bridge. Turn left onto DuPont Rd, Rt-892. Proceed approximately 1 mile to facility on the right.

THIS PERMIT REVISION IS ISSUED IN ACCORDANCE WITH THE WEST VIRGINIA AIR POLLUTION CONTROL ACT (W.VA. CODE §§ 22-5-1 ET SEQ.) AND 45CSR30 - "REQUIREMENTS FOR OPERATING PERMITS." THE PERMITTEE IDENTIFIED AT THE FACILITY ABOVE IS AUTHORIZED TO OPERATE THE STATIONARY SOURCES OF AIR POLLUTANTS IDENTIFIED HEREIN IN ACCORDANCE WITH ALL TERMS AND CONDITIONS OF THIS PERMIT.

A handwritten signature in blue ink, appearing to read "Laura M. Crowder".

Laura M. Crowder
Director, Division of Air Quality

November 13, 2019

Date Issued

Permit Number: **R30-10700001-2016**

Permittee: **~~E. I. du Pont de Nemours and Company~~ DuPont Specialty Products USA, LLC**

Facility Name: **Washington Works**

Business Unit: **Nylon Resins Production (Part 5 of 14)**

Mailing Address: **P. O. Box 2800, Washington, WV 26181-2800**

This permit is issued in accordance with the West Virginia Air Pollution Control Act (West Virginia Code §§ 22-5-1 et seq.) and 45CSR30 — Requirements for Operating Permits. The permittee identified at the above-referenced facility is authorized to operate the stationary sources of air pollutants identified herein in accordance with all terms and conditions of this permit.

Facility Location:	Washington, Wood County, West Virginia
Mailing Address:	P. O. Box 2800, Washington, WV 26181- <u>2800</u>
Telephone Number:	(304) 863- 2000 <u>4240</u>
Type of Business Entity:	Corporation
Facility Description:	Chemicals and Plastic Resins Manufacturing
SIC Codes:	2821
UTM Coordinates:	442.27 km Easting • 4,346.57 km Northing • Zone 17

Permit Writer: Denton B. McDerment, P.E.

Any person whose interest may be affected, including, but not necessarily limited to, the applicant and any person who participated in the public comment process, by a permit issued, modified or denied by the Secretary may appeal such action of the Secretary to the Air Quality Board pursuant to article one [§§ 22B-1-1 et seq.], Chapter 22B of the Code of West Virginia. West Virginia Code §22-5-14.

Issuance of this Title V Operating Permit does not supersede or invalidate any existing permits under 45CSR13, 14 or 19, although all applicable requirements from such permits governing the facility's operation and compliance have been incorporated into the Title V Operating Permit.

Emission Point ID	Control Device	Emission Unit ID	Emission Unit Description	Year Installed
Fugitive	None	Z331-3	Autoclave Solvent Parts Cleaner	1960's
Fugitive	None	Z331-4	B-144 Solvent Parts Cleaner	2015
Fugitive	None	Z338	A/C Maintenance Bead Blast Unit	1990
Fugitive	None	Z339	MPW Maintenance Bead Blast Unit	1972
Fugitive	None	Z809S	#3 Bagline Loading Conveyor	1972
Fugitive	None	Z811S	#3 Bagline Rework Conveyor	1972
Z804E	None	Z804	AC Bulk Truck Loading Facility	1979
Fugitive	None	Z10BIN	AC Finished Product Blender	1989
Z801E	None	Z801	AC Zytel® Orbital Blender System	1981
Fugitive	None	AC box fill	AC Box Fill from Tote Bins	1950
Fugitive	None	Z810	AC No. 1 Bagline (Tote Bins)	1974
Fugitive	None	ZIJP	AC and MPW Packaging – Ink Jet Printers	1978
<u>Z805E</u>	<u>None</u>	<u>Z805S</u>	<u>MPW-1 Sampling Ventilation Port</u>	<u>2019</u>

1.2. Active R13, R14, and R19 Permits

The underlying authority for any conditions from R13, R14, and/or R19 permits contained in this operating permit is cited using the original permit number (e.g. R13-1234). The current applicable version of such permit(s) are listed below.

Permit Number	Date of Issuance
R13-0278	01-14-1977
R13-0985	01-21-1988
R13-1686H	05-29-2018
R13-1145G	11-16-2018
R13-26174-K	<u>08-05-2019-08-5-2019</u>

Director
WVDEP
Division of Air Quality
601 57th Street, SE
Charleston, WV 25304

~~Associate Director~~ Section Chief
U. S. Environmental Protection Agency,
Region III
~~Office of Air Enforcement and Compliance~~
~~Assistance (3AP20)~~
Enforcement and Compliance Assurance Division
Air Section (3ED21)
1650 Arch Street
Philadelphia, PA 19103-2029

DAQ Compliance and Enforcement¹:

DEPAirQualityReports@wv.gov

¹For all self-monitoring reports (MACT, GACT, NSPS, etc.), stack tests and protocols, Notice of Compliance Status reports, Initial Notifications, etc.

- 3.5.4. **Certified emissions statement.** The permittee shall submit a certified emissions statement and pay fees on an annual basis in accordance with the submittal requirements of the Division of Air Quality.
[45CSR§30-8.]

- 3.5.5. **Compliance certification.** The permittee shall certify compliance with the conditions of this permit on the forms provided by the DAQ. In addition to the annual compliance certification, the permittee may be required to submit certifications more frequently under an applicable requirement of this permit. The annual certification shall be submitted to the DAQ and USEPA on or before March 15 of each year, and shall certify compliance for the period ending December 31. The permittee shall maintain a copy of the certification on site for five (5) years from submittal of the certification. The annual certification shall be submitted in electronic format by e-mail to the following addresses:

DAQ:

DEPAirQualityReports@wv.gov

US EPA:

R3_APD_Permits@epa.gov

[45CSR§30-5.3.e.]

- 3.5.6. **Semi-annual monitoring reports.** The permittee shall submit reports of any required monitoring on or before September 15 for the reporting period January 1 to June 30 and March 15 for the reporting period July 1 to December 31. All instances of deviation from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official consistent with 45CSR§30-4.4. The semi-annual monitoring reports shall be submitted in electronic format by e-mail to the following address:

DAQ:

DEPAirQualityReports@wv.gov

[45CSR§30-5.1.c.3.A.]

- 3.5.7. **Emergencies.** For reporting emergency situations, refer to Section 2.17 of this permit.

- 3.5.8. **Deviations.**

Emission Point	Equipment Description	Pollutant	Emission Limits	
			pph	tpy
		VOC	0.03	0.12
256-110	Z-2 Feed PCS A	Particulate	0.01	0.05
256-111	Z-2 Feed PCS R	Particulate	0.01	0.03
256-112	Z-2 Feed PCS S	Particulate	0.02	0.06
256-113	Z-2 Feed PCS T	Particulate	0.01	0.03
256-114	Z-2 Extruder Die Exhaust	CO	0.03	0.11
		Particulate	0.01	0.04
		VOC	0.03	0.11
256-115	Z-2 Extruder Vacuum Vent	CO	0.03	0.11
		Particulate	0.08	0.35
		VOC	0.01	0.01
256-116	Z-2 Cooler Conveying System	Particulate	0.02	0.07
256-117	Z-2 Cooler	Particulate	0.03	0.11
256-119	MPW-2 Dryer	Particulate	0.16	0.71
256-120	MPW2 Z-2 Feeder Exhaust	Particulate	0.03	0.11

Compliance with the above hourly particulate emission limits shall demonstrate compliance with the less stringent 45CSR§2-4.1.b hourly particulate emission limits and the 45CSR§10-3.1.e hourly sulfur dioxides emission limits for emission points 254-01, 254-02, 254-05, and 254-06; and the less stringent 45CSR§7-4.1 hourly particulate emission limits for emission points 252-60, 252-61, 252-63, 252-64, 252-73, 252-80, 252-81, 254-07, 254-08, 255-06, 255-07, 255-08, 255-56, 255-57, 255-58, 255-59, 256-03, 256-04, 256-05, 256-06, 256-60, 256-62, 256-70, 256-71, 256-72, 256-110, 256-111, 256-112, 256-113, 256-114, 256-115, 256-116, 256-117, 256-119, and 256-120.

[45CSR13, R13-1686, 4.1.1 and 4.1.3.3; 45CSR§2-4.1.b; 45CSR§7-4.1; 45CSR§10-3.1.e]

- 6.1.2. The permittee shall not exceed maximum hourly production rates and maximum yearly production rates as listed in the following table:

Product Name	Maximum Hourly (Production Units per Hour)	Maximum Annual (Production Units per Year)
6/6 Nylon		
(a) Virgin Nylon Basis	10.5	91,980
(b) Total Nylon Basis	10.9	95,660
Nylon Compounded Resins	4.8	42,048

[45CSR13, R13-1686, 4.1.2]

- 6.1.3. No person shall cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any process source operation which is greater than twenty (20) percent opacity. These provisions shall not apply to smoke and/or particulate matter emitted from any process source operation which is less than forty (40) percent opacity for any period or periods aggregating no more than five (5) minutes in any sixty (60) minute period. (252-60, 252-61, 252-63, 252-64, 252-73, 252-80, 252-81, 254-07, 254-08, 255-06, 255-07, 255-08, 255-56, 255-57, 255-58, 255-59, 256-03, 256-04, 256-05, 256-06, 256-60, 256-62, 256-70, 256-71, 256-72, 256-110, 256-111, 256-112, 256-113, 256-114, 256-115, 256-116, 256-117, 256-119, 256-120, Z702, Z703, Z704, Z705, Z707, Z737, Z742, Z743, Z746, Z610, Z612, Z643, Z644, Z614, Z403, Z404, Z405, Z406, Z408, Z710, Z725, Z410, Z411, Z412, Z623, and Z805E) [45CSR13, R13-1686, 4.1.3.1; 45CSR§§7-3.1. and 3.2.]

- 6.1.4. No person shall cause, suffer, allow or permit particulate matter to be vented into the open air from any type source operation or duplicate source operation, or from all air pollution control equipment

Emission Points	45CSR7 Hourly Particulate Emission Limit pph
<u>Z805E</u>	<u>3.4</u>

(Z702, Z703, Z704, Z705, Z737, Z742, Z743, Z746, Z610, Z612, Z643, Z644, Z614, Z403, Z404, Z405, Z406, Z408, Z710, Z725, Z410, Z411, Z412, ~~and~~ Z623, and Z805E)

[45CSR13, R13-1686, 4.1.3.3; 45CSR§7-4.1.]

- 6.1.5. For the natural gas-fired process heaters [254-01S, 254-02S, 254-05S, and 254-06S], the permittee shall not cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any fuel burning unit which is greater than ten (10) percent opacity based on a six minute block average.

[45CSR13, R13-1686, 4.1.4., 45CSR§2-3.1]

- 6.1.6. Control devices 252-80-C, 252-81-C, 256-03-C, 256-04-C, 256-62-C, 256-114-C, 256-116-C, 256-117-C, 256-119-C, and 256-120-C shall be operated in accordance with the following condition:

Operation and Maintenance of Air Pollution Control Equipment. The permittee shall, to the extent practicable, install, maintain, and operate all pollution control equipment listed in Section 1.0 and associated monitoring equipment in a manner consistent with safety and good air pollution control practices for minimizing emissions, or comply with any more stringent limits set forth in this permit or as set forth by any State rule, Federal regulation, or alternative control plan approved by the Secretary.

[45CSR13, R13-1686, 4.1.5]

- 6.1.7. Control devices Z703C, Z704C, Z410C, and Z411C shall be operated in accordance with 3.1.13.

[45CSR§30-5.1.c.]

6.2. Monitoring Requirements

- 6.2.1. For the purpose of determining compliance with the opacity limits of 45CSR§§7-3.1 and 3.2, for all emission points except Z805E the permittee shall conduct opacity monitoring and record keeping for all emission points and equipment subject to an opacity limit under 45CSR7. Monitoring shall be conducted at least once per month. These checks shall be conducted by personnel trained in the practices and limitations of 40 C.F.R. 60, Appendix A, Method 22 during periods of normal operation of emission sources that vent from the referenced emission points for a sufficient time interval (no less than 1 minute) to determine if there is a visible emission. If visible emissions are identified during the visible emission check, or at any other time regardless of operations, the permittee shall conduct an opacity reading using the procedures and requirements of 45CSR7A within seventy-two (72) hours of the first signs of visible emissions. A 45CSR7A evaluation shall not be required if the visible emission condition is corrected within seventy-two (72) after the visible emission and the sources are operating at normal conditions.

[45CSR§30-5.1.c.]